

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

TYLER BAKER, et al., on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

PARKMOBILE, LLC,

Defendant.

Case No. 1:21-CV-02182-SCJ

**CONSENT MOTION TO EXTEND THE DEADLINE  
TO REOPEN THE CASE**

COME NOW Tyler Baker, Mariam George, Emma Jackson, Sait Kurmangaliyev, Gregory Manson, Heriberto Traviesto, and Jack Weaver (“Plaintiffs”) and respectfully request that the Court extend the deadline by which the Parties may reopen the action if the settlement is not consummated and show the Court the following:

1. On July 15, 2024, the Parties reached a class-wide settlement in principle. Thereafter, the Parties began memorializing their agreement in writing.
2. The Parties reported to the Court in their Joint Notice of Settlement and Motion to Stay the case that they anticipated seeking preliminary approval of the settlement no later than August 30, 2024. ECF 267.

3. On July 18, 2024, the Court granted the Motion and stayed the civil action and further ordered that the action be administratively terminated during the pendency of the stay without prejudice to the right, upon good cause shown within sixty (60) days, to reopen the action if settlement is not consummated. ECF 268.
4. The sixty (60) day deadline to move to reopen the action if settlement is not consummated is September 16, 2024.
5. Plaintiffs drafted the Settlement Agreement and sent it to Defendant on August 2, 2024.
6. Plaintiffs selected a Claims Administrator, informed Defendant, and sent Defendant the Claims Administrator's Notice Plan Declaration, Long Form Notice, Short Form Notice, Claim Form, and revised Settlement Agreement identifying the Settlement Administrator on September 3, 2024.
7. On September 6, 2024, Defendant explained they are awaiting approval from the insurance carriers.
8. On September 9, 2024, Plaintiffs sent Defendant the Motion for Preliminary Approval and Proposed Order.
9. As of the date of this filing, the Plaintiffs await Defendant's response to the documents provided.

10. Plaintiffs conferred with Defendant and Defendant joins in this request and the relief sought.

THEREFORE, out of an abundance of caution, the Parties respectfully request that the Court extend the deadline to reopen the action for an additional twenty-four (24) days up through and including October 10, 2024 in order to allow Defendant and its carriers additional time to review the Settlement Agreement and related papers and allow the Parties to consummate the settlement.

Dated: September 12, 2024

Respectfully submitted,

/s/ MaryBeth V. Gibson

MaryBeth V. Gibson

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**LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing pleading filed with the Clerk of Court has been prepared in 14-point Times New Roman font in accordance with Local Rule 5.1(C).

Dated: September 12, 2024

/s/ MaryBeth V. Gibson  
MaryBeth V. Gibson

**CERTIFICATE OF SERVICE**

I hereby certify that on September 12, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

/s/ MaryBeth V. Gibson  
MaryBeth V. Gibson